

THE HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

GAVEN PICCIANO,  
Plaintiff,

v.

CLARK COUNTY, CLARK COUNTY JAIL,  
WELLPATH, LLC, and NAPHCARE, INC.,  
Defendants.

No. 3:20-cv-06106-DGE

**DECLARATION OF DAVID A.  
PEREZ IN SUPPORT OF MOTION  
TO EXCLUDE PLAINTIFF'S  
EXPERTS**

I, David A. Perez, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I am a partner at Perkins Coie, LLP, and I serve as counsel for Defendant NaphCare, Inc. in the above-entitled action. I submit this declaration in support of NaphCare's Motion for Partial Judgment on the Pleadings.

3. Attached hereto as **Exhibit A** is a true and correct copy of the independent medical examination conducted by Dr. Venkatachala Mohan, dated December 9, 2022.

4. Attached hereto as **Exhibit B** is a true and correct copy of the expert report of Dr. Andrew Ross, dated April 5, 2023.

DECLARATION OF DAVID A. PEREZ – 1  
(No. 3:20-cv-06106-DGE)

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, Washington 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

1           5.       Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff's medical  
2 records from Baraga County Memorial Hospital.

3           6.       Attached hereto as **Exhibit D** is a true and correct copy of Plaintiff's inmate  
4 booking intake package for his incarceration at Clark County Jail, dated January 30, 2020.

5           7.       Attached hereto as **Exhibit E** is a true and correct copy of Plaintiff's receiving  
6 screening at Clark County Jail, dated January 30, 2020.

7           8.       Attached hereto as **Exhibit F** is a true and correct copy of an inmate request slip  
8 written by Plaintiff, dated January 31, 2020.

9           9.       Attached hereto as **Exhibit G** is a true and correct copy of the expert report of  
10 Kathryn J. Wild, dated April 6, 2023.

11           10.      Attached hereto as **Exhibit H** is a true and correct copy of excerpts from the  
12 deposition transcript of Dr. Thomas Fowlkes, dated June 19, 2023.

13           11.      Attached hereto as **Exhibit I** is a true and correct copy of Plaintiff's medical records  
14 from Marquette General Hospital.

15           12.      Attached hereto as **Exhibit J** is a true and correct copy of Plaintiff's medical records  
16 from Legacy Salmon Creek Emergency Department.

17           10.      Attached hereto as **Exhibit K** is a true and correct copy of Plaintiff's medical  
18 records from PeaceHealth Fisher's Landing Family Medicine.

19           13.      Attached hereto as **Exhibit L** is a true and correct copy of Plaintiff's medical  
20 records from the Vancouver Clinic.

21           14.      Attached hereto as **Exhibit M** is a true and correct copy of excerpts from the  
22 deposition transcript of Dr. Alfred Joshua, dated June 27, 2023.

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DECLARATION OF DAVID A. PEREZ – 2  
(No. 3:20-cv-06106-DGE)

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16. Attached hereto as **Exhibit O** is a true and correct copy of excerpts from the deposition transcript of Dr. Isabel Hujoel, dated May 12, 2023.

17. Attached hereto as **Exhibit P** is a true and correct copy of the expert report of Dr. Isabel Hujoel.

18. Attached hereto as **Exhibit Q** is a true and correct copy of excerpts from the deposition transcript of Dr. Mitchel Holliday, dated May 26, 2023.

19. Attached hereto as **Exhibit R** is a true and correct copy of the expert report of Dr. Mitchel Holliday, dated April 10, 2023.

20. Attached hereto as **Exhibit S** is a copy of the Bureau of Prison's Management of Food Allergies Clinical Guidance, dated November 2017.

I declare under penalty of perjury and the laws of the State of Washington that the foregoing is true and correct.

DATED this 27th day of July, 2023, at Seattle, Washington.

By: s/ David A. Perez  
David A. Perez, WSBA No. 43959

**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that on July 27, 2023, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice List.

Dated: July 27, 2023

s/ David A. Perez

David A. Perez